

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

In the matter of:

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Chapter 9

Hon. STEVEN W. RHODES

Debtor in Possession_ /

CORRECTED OBJECTION TO AMENDED PLAN OF REORGANIZATION

BY Plaintiffs in Hyde Park Cooperative, et al v. City of Detroit

Note: Submitted on 4/1/2014 but stricken for “wrong event”
and promptly refiled.

The Plaintiffs in Hyde Park Cooperative et al v. City of Detroit object to confirmation of the plan of reorganization based upon:

- A. The plan is not in the best interests of the Creditors and is not feasible. 11 USC § 943(7):
1. The classes of creditors are confusing and the Hyde Park Plaintiffs cannot determine to which class they belong.
 2. The plan creates multiple classes of unsecured creditors, any one of which can confirm the plan.
 3. The proposed dividend to the unsecured creditors is less than is warranted by the future income of the Debtor in Possession.
- B. The plan fails to comply with the provisions of Chapter 9. 11 USC § 943(1) and (2).

Wherefore Hyde Park prays the Court will deny Confirmation of the Amended Plan of Reorganization.

FOR PLAINTIFFS IN HYDE PARK
LITIGATION:

By: /s/ kurt thornbladh

KURT THORNBLADH P25858

Thornbladh Legal Group PLLC

7301 Schaefer

Dearborn, MI 48126

(313) 943 2678

Kthornbladh@gmail.com

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